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15 Attorneys for Creditor Todd Herrold

16 UNITED STATES BANKRUPTCY COURT

17 DISTRICT OF NEVADA

18 [Reno Division]

19 In re: Michael Sheldon

20 No. Case No.: 25-50189 hlb

21 Debtor

22 [Chapter 7]

23 **Motion to Extend Time to File Complaint**

24 **Hearing Date: July 15, 2025**

25 **Time: 1:30 p.m.**

26 **Place: Honorable J.L. Barnes**

27 TO THIS HONORABLE COURT, AND TO MICHAEL SHELDON, DEBTOR, AND
28 HIS ATTORNEY OF RECORD, AND ALL INTERESTED PARTIES: PLEASE TAKE
NOTICE THAT TODD HERROLD, CREDITOR, THROUGH HIS ATTORNEYS OF
RECORD HEREBY Moves for an extension of time within which to file a complaint to deny the
discharge of Michael Sheldon and /or the Dischargeability of the obligations owed by Michael

1 Sheldon to Creditor Todd Herrold.

2 The motion of Todd Herrold (the “Creditor”) respectfully represents:

3 1. On March 6, 2025, Debtor Michael Sheldon (the “debtor”) filed a Voluntary
4 Petition for Relief under Chapter 7 of the Bankruptcy Code in the above-entitled Court (Case No.
5 25-50189).

6 2. Debtor listed Mr. Herrold as a creditor on his Summary of Assets and Liabilities
7 form filed with this Court on March 20, 2025. (Dkt. No 13)

8 3. Counsel for Creditor has been admitted pro hac vice by the Court as of May 14,
9 2025 (Dkt. No. 26), and had appeared at the first meeting of creditors held on or about April 9,
10 2025.

11 3. Debtor has recently amended his schedules A-F as of May 29, 2025 (Dkt. No. 29).

12 4. Pursuant to the general provision of Bankruptcy Rule 4004(a), the time for filing a
13 complaint objecting to the debtors’ discharge was originally set for June 9, 2025 and an original
14 date for the 341 meeting of the debtor was set for April 9, 2025.

15 5. This is the deadline set by the court for the filing of an adversary complaint. This
16 motion is timely.

17 6. Mr. Sheldon self-identifies as the sole owner of three other entities which all filed
18 Chapter 7 bankruptcies on the same date listing the same attorneys as record. Case Number 25-
19 50186, 25-50187, and 25-50188. The first meetings of creditors in each of those “companion”
20 bankruptcies are scheduled to occur on July 3, 2025.

21 7. Because of the newly amended schedules, those later scheduled first meeting of
22 creditors in cases directly aligned with Mr. Sheldon, together with other information Creditor/
23 Movant requests a brief extension of time in order to complete an investigation, Movants request
24 additional time to demand either a zoom supported 2004 examination and/or written 2004
25 requests prior to making a determination whether to file a complaint to deny discharge of the debt
26 that Debtor has failed to identify in his schedules.

27 8. An extension of time within which to file a complaint to object to debtor’s
28 Discharge, pursuant to both 11USC Section 523 and 11 USC Section 727 will allow for an

1 efficient use of the Court's time and resources to allow for a fuller investigation prior to bringing
2 an adversary action. Creditor request an extension of time of not less than 60 days after the
3 conduct of the first meeting of creditors in the above referenced companion cases to allow for an
4 efficient and cost reducing use of time and resources for all concerned including the Court and
5 Debtor.

6 WHEREFORE Movants prays for an order extending the time in which Movant may file a
7 complaint, pursuant to either 11 USC Section 523 and/or 11 USC Section 727, objecting to the
8 discharge of debtor and for such other and further relief as the Court deems proper.

9 Creditor reserves the right to supplement this request if necessary.

10 Dated: June 6, 2025

Respectfully submitted:
By: /s/ Sheila Gropper Nelson
Sheila Gropper Nelson
Resolution Law Firm P. C.
Attorney for Creditor

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